

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

**DANIEL KANG,**

**Plaintiff,**

**v.**

**THE MAYOR AND ALDERMEN OF THE  
CITY OF SAVANNAH, and ROY W.  
MINTER, JR., Chief of Police for the City  
of Savannah, Georgia, in his Individual  
Capacity,**

**Defendants.**

**Civil Action no: 4:21-cv-00111-WTM-CLR**

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**MOTION FOR WITHDRAWAL OF COUNSEL**

Pursuant to Local Rule 83.7, Defendant The Mayor and Aldermen of the City of Savannah, by and through its undersigned counsel, hereby requests that the Court withdraw K. Elizabeth Holland as its counsel in this action.

Ms. Holland's email notice to Defendant is attached as Exhibit A.

The City will continue to be represented by City Attorney R. Bates Lovett and Deputy City Attorney Jennifer N. Herman, and Patrick T. O'Connor and Patricia T. Paul of Oliver Maner LLP.

Respectfully submitted, this 11<sup>th</sup> day of August, 2021.

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/s/ Patricia T. Paul  
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State Bar No.: 548425  
PATRICIA T. PAUL  
State Bar No.: 697845

*Attorneys for Defendant The Mayor and  
Aldermen of the City of Savannah*

# **Exhibit A**

## Elizabeth Holland

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**From:** Elizabeth Holland  
**Sent:** Tuesday, July 27, 2021 3:44 PM  
**To:** BLovett@savannahga.gov; 'Jennifer Herman'  
**Cc:** Pat O'Connor; Patty Paul  
**Subject:** Kang v. The Mayor and Aldermen of the City of Savannah et al

Bates and Jennifer,

Pursuant to Local Rule LR 83.7, I am writing to confirm that I will be seeking to have my appearance on behalf of The Mayor and Aldermen of the City of Savannah withdrawn. Pat O'Connor and Patty Paul will continue on this case. Please let me know if you have any questions.

Sincerely,

Elizabeth Holland

**Elizabeth Holland**  
Associate



218 W. State Street | Savannah, Georgia 31401  
Office: 912.236.3311

**NOTICE:** This email and all attachments are CONFIDENTIAL and intended SOLELY for the recipients as identified in the "To", "Cc" and "Bcc" lines of this email. If you are not an intended recipient, your receipt of this email and its attachments is the result of an inadvertent disclosure or unauthorized transmittal. Sender reserves and asserts all rights to confidentiality, including all privileges that may apply. Pursuant to those rights and privileges, immediately DELETE and DESTROY all copies of the email and its attachments, in whatever form, and immediately NOTIFY the sender of your receipt of this email. DO NOT review, copy, forward or rely on the email and its attachments in any way. NO DUTIES ARE INTENDED OR CREATED BY THIS COMMUNICATION. You are encouraged to retain counsel of your choice if you desire to do so. All rights of the sender for violations of the confidentiality and privileges applicable to this email and any attachments are expressly reserved.

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**(PROPOSED) ORDER ON MOTION FOR WITHDRAWAL OF COUNSEL**

This action is before the Court on Defendant The Mayor and Aldermen of the City of Savannah's Motion for Withdrawal of Counsel.

For good cause shown, the motion is GRANTED. K. Elizabeth Holland shall be removed from this case, and will not receive any further notices.

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2021.

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CHRISTOPHER L. RAY  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF GEORGIA

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”), which was generated as a result of electronic filing, by email/electronic notification to the following: Brent J. Savage [bsavage@savagelawfirm.net](mailto:bsavage@savagelawfirm.net), Shawn A. Kachmar [skachmar@huntermaclean.com](mailto:skachmar@huntermaclean.com), and Taylor Dove [tdove@huntermaclean.com](mailto:tdove@huntermaclean.com).

This 11<sup>th</sup> day of August, 2021.

OLIVER MANER LLP

/s/ Patricia T. Paul

PATRICK T. O’CONNOR

State Bar No.: 548425

PATRICIA T. PAUL

State Bar No.: 697845

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Aldermen of the City of Savannah*

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